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**From:** Albright, David

**Sent:** Thursday, August 06, 2015 10:59 AM

**To:** Grevatt, Peter

**Cc:** Mason, Paula; Montgomery, Michael; Dermer, Michele; McWhirter, Lisa; Engelman, Alexa; Moffatt, Brett; Li, Corine

**Subject:** Call with Region 9 (CA UIC/Tribal DW)

Hi Peter,

For our call tomorrow (scheduled 9am-10am PDT), Mike asked that I forward the outline below regarding the CA Class II UIC program. We can also update you on tribal drought issues. Thanks, David

CA UIC Program

\* July 15<sup>th</sup> State Submittal

- Preliminary assessment of 11 aquifers (HTAE)
  - 1) 1 of the 11 may not be USDW; most or all of the others may not meet AE criteria
  - 2) 5 of the 11 have no active injection
  - 3) State expects at least 1 operator in the 11 to come forward with data/AE request
- No requests for AEs for disposal wells injecting into sub-3,000 ppm TDs aquifers (7/15/15 target date for state submittal)

- 1) Disposal wells into sub-3,000 aquifers required to shut down 10/15/15
- 2) State is reviewing one package; likely public notice starting in August (Arroyo Grande)

- Proposed plan and schedule for comprehensive Class II program improvements
- Outline of proposed public participation in State's AE process
- EPA reply letter
  - 1) Timing of final determinations by state of 11 aquifers HTAE (11/15/15 target)
  - 2) With no AE submittals, all Cat 1 wells in sub-3,000 aquifers (~50-60??) will cease injection by 10/15/15 per state's regulations

\* July 31<sup>st</sup> State Submittal

- Initial review of 5,675 Category 2 wells (EOR wells)
  - 1) EOR well breakdown (85% cyclic steam; 12% steam flood; 3% other)
  - 2) For thermal enhanced recovery wells (97% of Cat 2) – no further analysis
  - 3) 24 Cat 2 wells still under review; State may/will issue information orders and take action as needed
  - 4) EPA response to July 31<sup>st</sup> submittal

\* Other Key Items

- State's emergency/permanent regulations
  - Category 1 well evaluations
  - Class I injection wells
  - Congressional and 3<sup>rd</sup> party interests/calls
  - Contract support available for EPA review of CA AEs
  - Upcoming dates/milestones
- |    |                    |  |
|----|--------------------|--|
| AE | August 21, 2015:   | EPA/SB meeting on Class I wells                            |
|    | October 15, 2015:  | Shut-in of Cat 1 wells in sub-3,000 ppm TDS aquifers if no |
|    | November 15, 2015: | Target for 90% of Cat 1 AE requests, 100% of               |
|    | February 15, 2016: | Target for 90% of Cat 2 AE requests                        |

